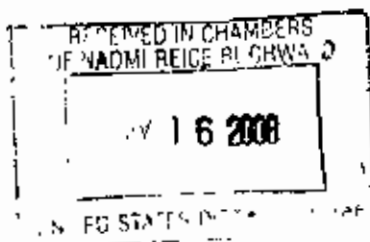


MEMO ENDORSED

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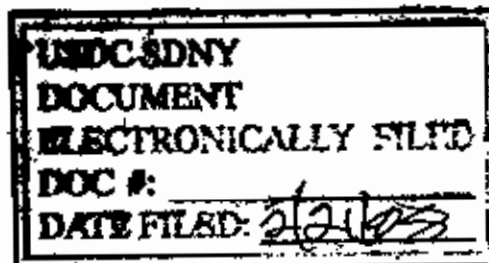
Philip A. Nemecek
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May 16, 2008

By Facsimile

Hon. Naomi Reice Buchwald, U.S.D.J.
U.S. District Court, Southern District of New York
500 Pearl Street, Room 2270
New York, New York 10007-1312

Re: *BAX Global, Inc. v. Ocean World Lines Inc.*
S.D.N.Y. Case No. 07 Civ. 10457 (NRB)
Our File No.: 339657-00001



Your Honor:

We represent BAX Global, Inc. and BAX Global, S.A., the plaintiffs in the referenced action.

By Order dated May 1, 2008, you scheduled an initial conference in this matter at 4:00 p.m. on Thursday, May 22, 2008. Together with counsel for defendant Ocean World Lines Inc. ("Ocean World"), and in the interest of judicial economy, we request at least a five-week adjournment of the initial conference to allow additional time for third-party defendants COSCO Container Lines and COSCO North America, Inc. (collectively, "COSCO") to interpose an answer or otherwise respond to the third-party complaint, make their mandatory initial disclosures and participate in the conference among the parties to discuss the matters specified in Fed. R. Civ. P. 26(f).

According to an affidavit of service filed with the Court, Ocean World served its third-party summons and third-party complaint upon third-party defendant COSCO North America, Inc. on May 6, 2008. To date, COSCO has not interposed an answer, nor has it otherwise appeared in this action through counsel.

Pursuant to the instructions set forth in the May 1, 2008 Order, counsel who have appeared to date are available for a rescheduled initial conference during regular business hours on any of the following dates: Wednesday, June 25, 2008; Thursday, June 26, 2008; Tuesday, July 8, 2008; and Wednesday, July 9, 2008. We are also prepared to propose additional dates and times for the rescheduled conference should the Court so request.

The
conference
is

adjourned
until June 25, 2008,
at 3:45 p.m.

So Ordered,
Naomi Reice Buchwald
Business,
5/20/08

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LONDON AFFILIATE: KATTEN MUCHIN ROSENMAN CORNISH LLP

A limited liability partnership including professional corporations



Hon. Naomi Reice Buchwald, U.S.D.J.
May 16, 2008
Page 2

There has been no previous request by any party for the relief requested herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Philip A. Nemecek". The signature is fluid and cursive, with a long horizontal stroke at the end.

Philip A. Nemecek

cc: Jessica De Vivo, Esq. (by fax & mail)
Cichanowicz, Callan, Keane, Vengrow & Textor, LLP
61 Broadway, Suite 3000
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